

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA

-v-

MICHAEL ESTRADA,

Defendant.  
-----X

STIPULATION IN SUPPORT  
OF APPLICATION FOR  
7<sup>TH</sup> OR SUBSEQUENT  
ORDER OF CONTINUANCE AND  
7TH ORDER OF CONTINUANCE

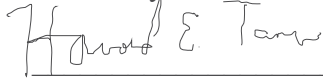
20 Mag. 1862

The United States of America and the defendant jointly request and agree that the time period from **September 2, 2020** to **September 30, 2020** be excluded from the computation of the period within which an information or indictment must be filed, pursuant to Title 18, United States Code, Section 3161(b) and (h)(7).

As background, MICHAEL ESTRADA, the defendant, was charged with violations of 21 U.S.C. § 846 in a complaint dated February 19, 2020. The defendant was presented before Magistrate Judge Lisa Margaret Smith on February 19, 2020, and the defendant was detained.

The parties submit that there is good cause for an additional exclusion of time because the parties are and have been actively exploring a possible disposition of this case prior to trial, and those ongoing discussions have been delayed in part due to the pandemic and restrictions on in-person meetings.

By the following signatures we agree and consent to the exclusion of time noted above:



Defendant's Counsel  
Howard Tanner, Esq.

9/1/2020

Date



Assistant U.S. Attorney  
David Felton

9/1/2020

Date

The defendant states that he has been fully advised by counsel of his rights guaranteed under (a) of the Sixth Amendment to the Constitution; (b) the Speedy Trial Act of 1974, as set forth in Title 18, United States Code, Sections 3161-74; and (c) the plans and rules of this Court adopted pursuant to that Act. The defendant understands that he has a right to be charged by indictment or information, and to have a trial before a judge or jury, within a specified time (excluding certain time periods) under the Constitution and Rules and Laws of the United States identified above. The defendant consents and agrees to the above request.

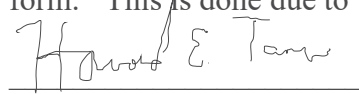
/s/ Michael Estrada  
Defendant  
MICHAEL ESTRADA

9/1/2020

Date

(Signed by counsel on defendant's behalf with permission)

I, Howard Tanner, have communicated with Mr. Estrada about the request for an order of continuance. He consents to the order of continuance. I have advised him of his rights as set forth in this stipulation. Mr. Estrada has approved my placing his electronic signature on this form. This is done due to travel restrictions and related concerns about COVID-19.



Defendant's Counsel

Howard Tanner, Esq.

9/1/2020

Date

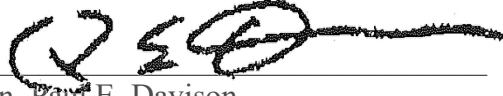
The joint application of the United States of America and the defendant having been heard at a proceeding on the date below, the time period from **September 2, 2020** to **September 30, 2020** is hereby excluded in computing the time within which an indictment or information must be filed. The Court grants this continuance on the finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial, for the reasons set forth above. The Court further orders:

Any subsequent application should recite further efforts to resolve the case during September, 2020

Dated: 9/2/20

White Plains, New York

**SO ORDERED**



Hon. Paul E. Davison

United States Magistrate Judge